



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

KDE/KCB  
F.#2015R00270

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 30, 2020

By E-mail and ECF

Honorable Frederic Block  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Renato Barca, Jr., et al.  
Criminal Docket No. 19-575 (FB)

Dear Judge Block:

The government writes to respectfully request that the Court enter the enclosed proposed protective order concerning certain discovery materials as to all defendants.

Based on the Court's rulings at the January 16, 2020 status conference, the government revised the proposed protective order and circulated it to defense counsel, all of whom have consented to its terms. Accordingly, for the reasons set forth in its prior submissions and for those discussed at the January 16 conference, the government

respectfully requests that the Court enter the enclosed proposed protective order, which has been signed by the government and counsel for all defendants, in counterparts.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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Encl.

cc: Clerk of Court (by ECF)  
Defense Counsel (by ECF)